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Panther (Big) Creek Hot Springs Geothermal Leasing Project

Dear Jay:

The Idaho Department of Fish and Game (?Department?) has reviewed the Panther (Big) Creek Hot Springs Geothermal Leasing Project. As you are aware the Department provided a comment letter in May of 2012 (attached PDF file). We would like to thank you and your staff for incorporating fish and wildlife protections into the draft Lease Stipulations and Notices. We are presently working with Lucinda Haggas and Piper Gossel to ensure all current wildlife observational data in our Idaho Fish and Wildlife Information System (IFWIS) or located in regional files are reflected in the Lease Stipulations and Notices. We thank you for the opportunity to work with your staff on this project. We offer the following comments concerning the Recommended Lease Stipulations in Table 1 and Lease Notices.

Comments on Recommended Lease Stipulations:

Within NSO-Lands within the Salmon River breaks (from Salmon River to the topographic divide) it should also be noted in the Rationale that the area is Big Game Winter range, as identified in the Panther (Big Creek) Hotsprings Geothermal Project map (?Project Map?). Any Waiver, Exception or modification should take into seasonal consideration to avoid disturbance between December 1 and April 15.

Is there any way to develop a map of spotted frog and western toad habitats? The Department will search our IFWIS system to see if we have any occurrence records for these species. If they are known to be in the project area we recommend that you determine if a model exists to predict their habitats for inclusion in the Project Map.

Lease Notices

Lease Notice (7): Mentions Designated Critical Habitat for ESA listed fish species. These areas may be officially mapped. If so it may be appropriate to include the mapped areas in the Project Map.

Lease Notice (21): Notes that Lease operations shall not interfere with commercial hunting opportunities for outfitters with the rationale of hunt seasons for cougar, bear and wolf. The Department notes that outfitters also hunt deer and elk in this area and these species should be included in the rationale. Additionally, the

Department recommends Lease Notice (21) include language that generally states:

Lease operations shall not interfere with public hunting during any open season nor shall operations prevent public access for hunting purposes on Forest Service roads and trails open to public travel.

Lease Notice (23): The Department also recommends citing APLIC (2006) in the rationale. Avian Powerline Interaction Committee (APLIC). Suggested Practices for Avian protection on power lines.

Lease Notice (25): Mentions aspen habitat. The Department recommends that aspen habitats are mapped in the Project Map. The Department has aspen GIS layers available. Additionally, the mapped aspen habitats may be used for mapping calving areas for big game. We encourage the Forest Service to work with the Department to see if we can help map aspen habitats.

The Department appreciates the opportunity to review and comment on the draft Lease Stipulations and Notices for the Panther (Big) Creek Hot Springs Geothermal Leasing Project. We look forward to working with Forest Service project staff to ensure all current wildlife and habitat data, that we may have, is incorporated in the Project.

Tom Bassista

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